

ESTTA Tracking number: **ESTTA621496**

Filing date: **08/14/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	91204727
Applicant	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company
Other Party	Defendant Stuart Adamson and Hilary Claire Adamson
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	No

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 08/15/2014. Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company requests that such date be extended for 60 days, or until 10/14/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	10/14/2014
Deadline for Discovery Conference :	11/13/2014
Discovery Opens :	11/13/2014
Initial Disclosures Due :	12/13/2014
Expert Disclosure Due :	04/12/2015
Discovery Closes :	05/12/2015
Plaintiff's Pretrial Disclosures :	06/26/2015
Plaintiff's 30-day Trial Period Ends :	08/10/2015
Defendant's Pretrial Disclosures :	08/25/2015
Defendant's 30-day Trial Period Ends :	10/09/2015
Plaintiff's Rebuttal Disclosures :	10/24/2015
Plaintiff's 15-day Rebuttal Period Ends :	11/23/2015

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *Progress has been made towards settlement of this matter. Since the institution of the proceedings, the parties have had substantial settlement negotiations, and have prepared, revised, and exchanged multiple drafts of a settlement agreement. Specifically, since the parties last sought an extension of the proceedings, Opposer's in-house counsel completed its review of the latest draft of the revised agreement, and relayed its comments to Opposer's outside counsel. Opposer's outside counsel revised the agreement accordingly, and on July 21, 2014, relayed the revised agreement to Applicant's counsel for consideration. Additionally, the parties' counsel conferred regarding the matter on June 10, 2014, July 8, 2014, July 21, 2014, August 6, 2013, August 11, 2014 and August 14, 2014. The additional time is requested to allow Applicant to consider the revised agreement, and the parties time to continue to work towards settlement of this matter, including the continued negotiation of any remaining issues relating to the use and registration of the parties' respective marks. The parties believe that they will timely resolve any open issues. If*

the agreement is accepted, this matter will be resolved, and there will be no need to proceed with the Opposition.

Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/Aryn M. Emert/

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